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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MICHAEL W. DOBBINS  
CLERK, U. S. DISTRICT COURT

CARL A. REED

}

Plaintiff(s),

Chicago Housing Authority;  
The Woodlawn Organization Inc.  
3101A Lincoln Perry Senior Apartments  
Defendant(s).

}

11CV8316  
JUDGE HIBBLER  
MAG. JUDGE FINNEGAN

**COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS**

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

- This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.  
*Section 982 of*
- The court has jurisdiction under 28 U.S.C. §§ 1343 and 1337.
- Plaintiff's full name is CARL ARNOLD REED.

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

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4. Defendant, CHICAGO HOUSING AUTHORITY, is  
 (name, badge number if known)  
 an officer or official employed by CITY OF CHICAGO;  
 (department or agency of government)  
 or  
 an individual not employed by a governmental entity.

*If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.*

5. The municipality, township or county under whose authority defendant officer or official acted is CITY OF CHICAGO. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.
6. On or about \_\_\_\_\_, at approximately \_\_\_\_\_  a.m.  p.m.  
 (month, day, year)  
 plaintiff was present in the municipality (or unincorporated area) of \_\_\_\_\_

\_\_\_\_\_, in the County of \_\_\_\_\_,  
 State of Illinois, at \_\_\_\_\_  
 (identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
  - searched plaintiff or his property without a warrant and without reasonable cause;
  - used excessive force upon plaintiff;
  - failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
  - failed to provide plaintiff with needed medical care;
  - conspired together to violate one or more of plaintiff's civil rights;
  - Other:
- \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): RACIALIZATION OF PUBLICLY ASSISTED HOUSING RESOURCES
- \_\_\_\_\_

8. Plaintiff was charged with one or more crimes, specifically: Not Applicable

Not APPLICABLE

9. (Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other") The criminal proceedings
- are still pending.  
 were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>  
 Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows \_\_\_\_\_.
- Other: \_\_\_\_\_.

10. Plaintiff further alleges as follows: (Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)

I HAVE BEEN DENIED HOUSING AS A RETALIATION FOR FORMALLY COMPLAINING ABOUT RACIALLY SEGREGATED HOUSING SITES WHERE THE LOCALIZATION OF POVERTY, CRIME AND RACE LAYERS BLACKS ON TOP OF OTHER BLACKS WITHOUT REGARD FOR AGE. FURTHER, CHICAGO HOUSING AUTHORITY IN CONCERT WITH TWO CONFISCATED MY BELONGINGS AND SECURITY DEPOSIT W/O CAUSE BECAUSE I REFUSED TO WITHDRAW MY COMPLAINT REGISTERED WITH CHICAGO COMMISSION ON HUMAN RELATIONS.

<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.  
11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

DENIED ACCESS TO REASONABLE  
ACCOMMODATION WHICH HAS WORSENED  
MY INTERMITTENT HOMELESSNESS  
\_\_\_\_\_.

13. Plaintiff asks that the case be tried by a jury.  Yes  No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B.  (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Carl A. Reed

Plaintiff's name (print clearly or type): CARL A. REED

Plaintiff's mailing

address: 70 P.O. Box 7049  
City CHICAGO State IL ZIP 60680

Plaintiff's telephone number 615) 556-4406.

Plaintiff's email address (if you prefer to be contacted by email): reed\_carl  
@hotmail.com

15. Plaintiff has previously filed a case in this district.  Yes  No

If yes, please list the cases below.

1:93-CV-06304; 1:93-CV-07661; 1:97-CV-07561; 1:99-CV-01550

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.